



CILENTI & COOPER, PLLC

ATTORNEYS AT LAW
200 Park Avenue - 17th Floor
New York, New York 10166

Telephone (212) 209-3933
Facsimile (212) 209-7102

May 10, 2022

**MOTION FOR EXTENSION OF TIME
TO FILE REQUEST FOR APPROVAL**

BY ECF

The Honorable Barbara Moses
United States Magistrate Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

**Re: Oscar Vences v. 99 Cents USA, et. al.
Case No. 21 Civ. 5134 (BM)**

Dear Judge Moses,

We are counsel to the plaintiff. We write to inform the court that the settlement agreement has been drafted and approved by counsel, and executed by plaintiff. The *Cheeks* motion is prepared and approved by counsel.

The motion for approval was due yesterday. This is plaintiff's motion for a one-week extension, to May 16, 2022, to file the fully executed settlement and joint request for approval. If the parties are unable to file it by that date, we will ask the court to order defendants to show cause why they have not executed the settlement.

This is our first request for an extension of the deadline (we apologize that is it not timely), and no other dates or deadlines will be affected. Defense counsel has confirmed that they are waiting for their client to execute the settlement, thus necessitating this motion.

We thank the court for its consideration of this case.

Respectfully,

/s/ Peter Hans Cooper

Peter H. Cooper

cc: Stephen D. Hans, Esq. (Via ECF)

Application GRANTED. SO ORDERED.

Barbara Moses, U.S.M.J.

May 10, 2022